

Alliance for Nuclear Accountability
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Alliance for Nuclear Accountability

*A national network of organizations working to address issues of
nuclear weapons production and waste cleanup*

February 23, 2001

Gary Hartman
U S Department of Energy
Oak Ridge Operations, DP-80
P O Box 2001
Oak Ridge, TN 37831
Fax 865-576-1237

Dear Mr. Hartman:

On behalf of the Alliance for Nuclear Accountability, a nation-wide network of over 30 organizations working in the shadow of the nuclear weapons complex, I am writing to urge the Department of Energy (DOE) to reject plans under the Y-12 Site-wide Environmental Impact Statement (EIS) to build a New Special Materials Facility (i.e., bomb-making plant).

The DOE's recommendation to move forward with a new bomb-making grossly misjudges three central issues: (1) plans for new warhead production facilities are premature, disconnected from the larger policy process, and are unnecessary given the post-Cold War era of promised nuclear reductions, (2) environmental and health impacts of new facilities, including environmental justice issues and long-term environmental management and cost issues, are underestimated, and (3) new facilities are not needed to secure the economic future of Oak Ridge.

(1) Plans for new warhead production facilities are premature, disconnected from the larger policy process, and are unnecessary given the post-Cold War era of promised nuclear reductions

The GAO's December 2000 report, Nuclear Weapons: Improved Management Needed to Implement Stockpile Stewardship Program Effectively (GAO-01-48) points out that one of the central barriers to improved management of the Stockpile Stewardship Program (SSP) is the lack of firm program requirements. These program requirements, governing the number of warheads to be maintained in the U.S. arsenal, are not likely to be clear until the new Bush administration makes these decisions after the completion of the Nuclear Posture Review in December of this year. Without knowing the scope and sizes of SSP, planning for expensive new bomb-making facilities is premature.

The DOE's recommendation to build a new bomb plant is based on plans to maintain a nuclear stockpile of over 6,000 nuclear warheads, a figure that is very likely to become obsolete within a year given President Bush's pledge to cut the size of the stockpile, perhaps to a level of 1,500. With such a reduction, the focus of the DOE would move from warhead replacement to retiring and dismantling aging warheads. For the DOE to press forward for new facilities without a justifiable need provides the appearance of a federal agency recommending programs simply to sustain its own budgets for reasons wholly separate from national security needs.

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Comment No. 1

Issue Code: 16

There is no plan or proposal in the Y-12 SWEIS to build a new bomb plant or to increase the Nation's nuclear weapon stockpile. Since the end of the Cold War, the United States has significantly reduced the size of its nuclear weapons stockpile and DOE has dismantled more than 15,000 nuclear weapons. At the present time, the United States is further downsizing its deployed nuclear weapons stockpile consistent with the terms of the Strategic Arms Reduction Treaty (START) I and START II treaties. Although Russia suspended its nuclear weapons dismantlement activities on January 20, 2001, DOE has continued its weapons dismantlement activities and the proposed action in the Y-12 SWEIS includes continuing weapons dismantlement activities at Y-12. While future arms control reductions may change requirements for maintaining the weapons stockpile, DOE is responsible for meeting the current requirements set forth by the President and Congress in the Nuclear Weapons Stockpile Plan. Although the President may propose nuclear arms reduction and stockpile levels, Congress must authorize and approve the budget to implement the proposal. The need for nuclear weapons and the issue of how many nuclear weapons the United States maintains as a nuclear deterrent are beyond the scope of the Y-12 SWEIS.

The Stockpile Stewardship Program is ongoing and managed using the latest program requirements based on the Nuclear Weapons Stockpile Plan. As with any long-term program, requirements can change and would be accommodated as appropriate. Regardless, Y-12 Defense Programs types of activities in support of the Nation's nuclear weapons stockpile (whether 6,000 or 1,500 weapons) would remain the same, and the facilities used to perform these activities would still need to be modernized at the some point to continue their use. However, there are no proposals or plans for new bomb-making facilities at Y-12.

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(2) Environmental and health impacts of new facilities, including environmental justice issues and long-term environmental management and cost issues, are underestimated

The EIS fails to provide any realistic account of the environmental and health impacts of the proposed facilities. The health and environmental impacts to date in the Oak Ridge area have been devastating and communities such as the African-American Scarboro community have suffered disproportionately. For DOE to claim there is no environmental justice issue is blatantly racist and to minimize the environmental and health impacts of future facilities is tremendously short-sighted and reflects a callous disregard for the "security" of U.S. citizens living in the shadow of the bomb complex.

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A full accounting of the environmental and cost impacts should include a complete life cycle cost analysis with the costs of remediation for accidents or contamination leaks as well as the decontamination and decommissioning costs and finally the long-term stewardship needs of the facility.

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(3) New facilities are not needed to secure the economic future of Oak Ridge.

The proposed facilities will not be an economic boon to Oak Ridge. The Chemical processing plant is only expected to employ 36 persons whereas the current Y-12 workforce can be gainfully employed in dismantling nuclear weapons for quite some time. According to the DOE, there is at least a seven-year backlog of retired bombs waiting to be dismantled. With further arms reductions, that number will grow.


4/03

The DOE's recommendation to build new bomb facilities in the name of national security represents a massive miscalculation of the nation's security needs in the post-Cold War environment and a blatant disregard for the security of the workers and surrounding communities who will be asked to shoulder a new generation of contamination created by weapons production.

The DOE has established a record of very poor credibility in Oak Ridge and around the nation. Time and again, the DOE has misled the public and failed to provide complete health and safety information even to its own workers. The GAO has noted that the Office of Defense Programs is a "dysfunctional organization" with programs "fragmented at the headquarters level," making it "harder for managers to balance competing resource priorities" (GAO-01-48, pp. 8-9). In such a climate the DOE is not ready to make recommendations regarding new bomb-making facilities until management improves and program requirements are clarified. Instead of pursuing new facilities and fatter budgets, the DOE should be working to get its own house in order and improving its relationships with workers and communities to become more responsible in addressing the legacy of contamination and sickness left by the DOE and its contractors.

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(cont.)

Sincerely,


Jim Bridgman
Program Director

Comment No. 2

Issue Code: 13

DOE is committed to compliance with provisions of Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. The environmental justice analysis was prepared in compliance with the Council on Environmental Quality's (CEQs) guidelines of environmental justice under NEPA. The Y-12 SWEIS addresses the issue of whether implementation of the proposed action or alternatives would result in disproportionately high and adverse environmental effects on minority populations or low-income populations. As discussed in Volume I, Chapter 5 of the Y-12 SWEIS, implementation of the proposed action and alternatives for the continuation of the Y-12's weapons support mission and the construction and operation of new facilities for the HEU Storage and Special Materials missions at Y-12 would pose no significant radiological or nonradiological health risks to the public. The conservatively estimated dose to the MEI for Alternative 4 would be approximately 4.5 mrem/year, which is below the radionuclide NESHAP standard of 10 mrem/year. The risks would not be significant regardless of the racial, ethnic, and economic composition of potentially affected populations. (See also the response to Comment No. 20 concerning the Scarboro Community on page 212).

Comment No. 3

Issue Code: 16

The Y-12 SWEIS assesses the potential environmental impacts associated with the continued operation of the Y-12 National Security Complex, and the proposed construction and operation of new facilities for the HEU Storage Mission and the Special Materials Mission at Y-12. Preparing a life cycle cost analysis at this time would be premature and not add significantly to the decisions to be made on the Y-12 SWEIS. DOE believes that the SWEIS provides a direct technical analysis of the impacts of proposed future actions at Y-12. The analysis reflect current design and health and safety practices, considered to be of appropriate detail at this stage of project development, and adequate to support decisions to be made on the Y-12 SWEIS.

Comment No. 4

Issue Code: 03

Comment noted. The area economic effects would be short-term while construction of new facilities are underway. During construction, the existing ROI labor force could likely fill all of the jobs generated by the increased employment and expenditures. The alternatives analyzed in the Y-12 SWEIS are proposed to help meet DOE's mission requirements, while at the same time increase protection of human health, safety, and the environment, and achieve a greater level of efficiency and cost-effectiveness. DOE is not proposing projects to build more nuclear weapons or create bombs to spur the local economy.